

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CRUM AND FORSTER SPECIALTY
INSURANCE COMPANY,

Plaintiff,

v.

CHRIS ELDREDGE CONTAINERS,

Defendant.

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CIVIL ACTION

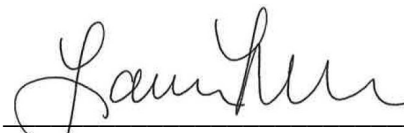
No. 2:22-cv-01123-JP

DEFENDANT'S MOTION TO DISMISS

Pursuant to Federal Rules of Civil Procedure 12(b)(7), 19, and 12(b)(1), Defendant, Chris Eldredge Containers, LLC, by and through its counsel, Gawthrop Greenwood, PC, respectfully moves this Honorable Court for an order of dismissal of all of Plaintiff's claims against Defendant.

The grounds for this Motion are fully set forth in the accompanying Memorandum of Law in Support of Defendant's Motion, which is incorporated herein by reference as if set forth fully at length.

WHEREFORE, Defendant, Chris Eldredge Containers, LLC, respectfully requests that this Honorable Court grant its Motion and enter an Order DISMISSING Plaintiff's Complaint.



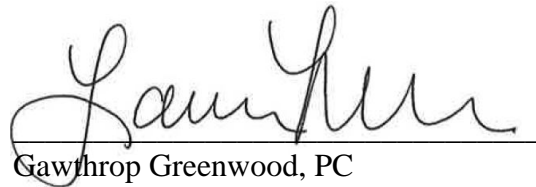
Gawthrop Greenwood, PC
Lauren A. Nehra, Esquire
Stephen R. McDonnell, Esquire
17 East Gay Street, Suite 100
P.O. Box 562
West Chester, PA 19381
Attorney for Defendant
Chris Eldredge Containers, LLC

Dated: June 13, 2022

CERTIFICATE OF SERVICE

I, Stephen R. McDonnell, Esquire, hereby certify that on this 13th day of June, 2022, a copy of Defendant's Motion to Dismiss with accompanying Brief was electronically filed with the Court via ECF and was served on Plaintiff via its counsel of record via email, as follows:

Elizabeth A. Sutton, Esquire
Eileen M. Bradley, Esquire
Kennedys CMK LLP
1600 Market St., Ste. 141
Philadelphia, PA 19103

A handwritten signature in black ink, appearing to read "Lauren", is written over a horizontal line.

Gawthrop Greenwood, PC
Lauren A. Nehra, Esquire
Stephen R. McDonnell, Esquire
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